

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
LEE GODFREY and YUN JAE CHUNG

CIVIL ACTION NO.: 1:20-cv-07230

- Plaintiffs -

DISCOVERY STIPULATION

v.

EXECUTIVE RISK INDEMNITY INC.,

- Defendant -

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the parties that:

1. Defendant shall respond to plaintiffs' Interrogatories and Request for Production of Documents on or before March 5, 2021;
2. Depositions of party representatives shall occur on or before May 26, 2021;
3. All other fact witness depositions shall occur on or before June 25, 2021;
4. The Fact Discovery Deadline shall be August 20, 2021;
5. Plaintiffs' shall provide Rule 26(a)(2) expert disclosures by September 24, 2021;
6. Defendant shall provide Rule 26(a)(2) expert disclosures by October 22, 2021;
7. Expert depositions are to be held on or before December 10, 2021;
8. The final date for dispositive motions is January 7, 2022;
9. Joint Pre-Trial Order is due on January 31, 2022 or 21 days after decision on any dispositive motions;
10. Trial is to take place 14 days after submission of Joint Pre-Trial Order;

Dated: New York, New York
February 23, 2021

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SO ORDERED: /s/ John G. Koeltl

U.S.D.J.

March 29, 2021

New York, New York